REMARKS

This response addresses the Office Action mailed November 26, 2003. Reconsideration of the present application is respectfully requested.

I. Claim rejection under 35 U.S.C. § 112, second paragraph

In the Office Action, Applicant's Claim 3 was rejected because a word lacked antecedent basis. This response includes an amendment of Claim 3 that addresses this rejection.

II. Claim rejections under 35 U.S.C. § 103

In the Office Action, Applicant's Claims 1, 2, 5, 7, 8 and 10 were rejected as obvious over the combination of U.S. Pat. No. 6,477,526 ("Hayashi") and U.S. Pat. No. 6,297,748 ("Lappenbusch"). Applicant's Claims 3, 4, 6, 9, and 11 were rejected as obvious over the combination of Hayashi, Lappenbusch, and U.S. Pat. No. 6,553,309 ("Uchida"). Applicant respectfully traverses the rejections of Claims 1-11. Applicant respectfully requests the Examiner to reconsider and withdraw the rejections of these claims.

A. Applicant's Claim 1

Applicant's independent Claim 1 relates to a *"navigation system"* in which *"end user electronic devices"* send *"requests"* for *"navigation services"* to a *"customer-interface server"*, which in turn, transmits *"query messages"* over the *"Internet"* to a *"navigation-services server"* for information to respond to the *"requests."* The *"navigation-services server"* uses *"navigation applications"* and an associated *"geographic database"* to formulate *"language-independent reply messages"* that are sent to the *"customer-interface server."* The *"customer-interface server"* uses the *"language-independent reply messages"* to formulate *"responses"* that are sent to the *"end user electronic devices."*

B. Hayashi

Hayashi relates to a system for providing map information. The Hayashi system uses three servers: a WWW server 22, a route calculation server 16 and a map server 12. (Hayashi: column 4, lines 12-14.) A user initiates a request for map information by communicating with the WWW server 22. (Hayashi: column 4, lines 17-21 and column 5, lines 51-63.) The WWW server 22 provides information that enables the user's terminal 1 to display a map and other information by which the user can indicate the origin and desired destination for a route. (Hayashi: column 7, lines 8-13; column 7, line 63-column 8 line 33.) This origin and destination information is sent from the user terminal 1 to the WWW server 22 (Hayashi: column 8, lines 60-63), which in turn sends it to the route calculation server 16. (Hayashi: column 9, lines 1-5.) The route calculation server 16 calculates a route and returns a *"route ID"* and *"route point data sequence"* to the WWW server 22. (Hayashi: column 9, lines 4-17.) The WWW server 22 sends the *"route ID"* to the end user terminal 1, but does not send the *"route point data sequence"* to the end user terminal 1 because of its large data size. (Hayashi: column 9, lines 27-35.) The end user terminal 1 sends the *"route ID"* to the map server 12, which in turn sends it to the route calculation server 16. (Hayashi: column 9, lines 47-54.) The route calculation server 16 sends the *"route point data sequence"* to the map server 12, where the map server 12 prepares a *"route display picture"* showing the calculated route on a map. (Hayashi: column 9, lines 58-62.) The map server 12 converts the *"route display picture"* to a GIF file and sends it to the end user terminal 1. (Hayashi: column 9, lines 62-64.)

C. Lappenbusch

Lappenbusch discloses an interactive traffic display system. According to Lappenbusch, a user can select a road segment on a map that is graphically displayed in one area of a computer display screen and the system will provide a recent camera or video image of the selected road segment in another area of the computer display screen. (Lappenbusch: column 5, line 65-column 6, line 63; and FIGS. 4 and 5.) Lappenbusch indicates that the system may obtain traffic data and images from multiple sources (e.g.,

highway monitoring systems) and that these sources may provide the data in different, possibly proprietary formats. (Lappenbusch: column 2, lines 25-31.) Lappenbusch indicates that the traffic data from the different sources are converted into a common file format and sent to client devices. (Lappenbusch: column 8, lines 43-48.) Lappenbusch discloses that client devices use data that is formatted in HTML, applets, or raw data. (Lappenbusch: column 5, lines 13-39.)

D. Applicant's Claim 1 is not obvious over Hayashi and Lappenbusch.

In the Office Action, the position was taken that Hayashi disclosed the limitations of Applicant's Claim 1, except that Hayashi did not disclose that the reply messages were language independent. According to the Office Action, Lappenbusch teaches the desirability of providing an end user with language independent navigation information so that data from plural different systems can be used.

There are several reasons why Applicant's Claim 1 is not obvious over the combination of Hayashi and Lappenbusch.

1. Hayashi relates to "formats" not "languages."

First of all, Hayashi and Lappenbusch, even if combined, do not disclose all the limitations of Applicant's Claim 1. Specifically, neither Hayashi nor Lappenbusch disclose a system that includes *"language-independent reply messages"* as recited in Applicant's Claim 1.

The Office Action acknowledged that Hayashi did not disclose reply messages that were language independent, but stated that Lappenbusch taught the desirability of providing an end user with navigation information which is language independent. The position expressed in the Office Action that Lappenbusch teaches the desirability of providing an end user with navigation information that is *language* independent is incorrect. Lappenbusch does not relate to *language* independence. Rather, Lappenbusch refers to *"formats"*, specifically *"file formats."* Lappenbusch discloses that data obtained from different sources, which may be in different *formats*, may be converted into a common *"file format."* (Lappenbusch: column 8, lines 38-52.) A "format" is not

the same as a "language." Although Lappenbusch may teach the desirability of a common *"file format"*, Lappenbusch does not have any disclosure relating to or teaching the desirability of *language-independence*. Accordingly, at least for this reason, Applicant's Claim 1 is not obvious over the combination of Hayashi and Lappenbusch.

2. Hayashi and Lappenbusch fail to disclose the replay message feature of Applicant's claim.

Another reason why Applicant's Claim 1 is not obvious over the combination of Hayashi and Lappenbusch is that these references, even if combined, fail to disclose the feature of the claim that recites that *"responses"* to end user *"requests for navigation services"* are sent from a *"customer-interface server"* to *"end user electronic devices."*

For the sake of argument, assume that the WWW server 22 of Hayashi corresponds to the *"customer-interface server"* of Applicant's Claim 1 and that the route calculation server 16 of Hayashi corresponds to the *"navigation-services server"* of Applicant's Claim 1. In Hayashi, the route calculation server 16 prepares a *"route data point sequence"* and *"route ID"* which are sent to the WWW server 22. (Hayashi: column 9, lines 9-13.) Then, the WWW server 22 sends the *"route ID"* to the user terminal 1. However, Hayashi specifically states that the *"route point data sequence"* is not sent to the end user terminal 1 because it is too large. (Hayashi: column 9, lines 32-35.) The end user terminal 1 then makes a separate request for route information by sending the *"route ID"* to the map server 12 in order to obtain the GIF image of the route. (Hayashi: column 9, lines 45-64.) Thus, in the Hayashi system, the end user receives route information from the map server 12 and not the WWW server 22. Therefore, Hayashi is unlike Applicant's Claim 1 which recites that the *"responses"* for the *"requests for navigation services"* are obtained by the end users from the same entity (i.e., the *"customer-interface server"*) to which the *"requests"* are sent.

For this additional reason, Applicant's Claim 1 is not obvious over the combination of Hayashi and Lappenbusch.

E. Applicant's Claim 7 is not obvious over Hayashi and Lappenbusch.

Applicant's independent Claim 7 is not obvious over the combination of Hayashi and Lappenbusch for at least the same reasons as explained above in connection with Claim 1.

F. Applicant's dependent Claims 2, 5, 8 and 10 are not obvious over Hayashi and Lappenbusch.

Applicant's dependent Claims 2, 5, 8 and 10 are allowable over the combination of Hayashi and Lappenbusch at least for the same reasons as their respective base claims. In addition, these claims include additional limitations and features that are neither disclosed nor suggested by Hayashi or Lappenbusch.

G. Applicant's dependent Claims 3, 4, 6, 9, and 11 are not obvious over Hayashi, Lappenbusch, and Uchida.

Applicant's dependent Claims 3, 4, 6, 9, and 11 are allowable over the combination of Hayashi, Lappenbusch and Uchida at least for the same reasons as their respective base claims. Uchida includes no disclosure that, when combined with Hayashi and Lappenbusch, show all the limitations of these claims. In addition, these claims include additional limitations and features that are neither disclosed nor suggested by Hayashi, Lappenbusch or Uchida.

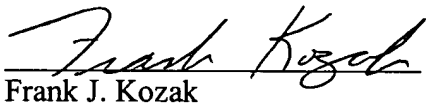
III. Extension of time

Included with this response are a petition for an extension of time to respond to the Office Action dated November 26, 2003 and an authorization for payment of the fee associated therewith.

IV. Conclusion

Applicant submits that this response addresses all the issues in the Office Action dated November 26, 2003. Therefore, the present application is in condition for allowance. If any issues remain, the Examiner is invited to call the undersigned.

Respectfully submitted,



Frank J. Kozak
Reg. No. 32,908
Chief Intellectual Property Counsel

NAVEQ North America, LLC
222 Merchandise Mart Plaza, Suite 900
Chicago, IL 60654
(312) 894-7000 x7371